

**Public Testimony to NOSB Regarding Access to Pasture
LaCrosse, WI June 6, 2001**

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Good morning. I appreciate the opportunity to address the National Organic Standards Board. I am Pam Saunders, Meat Pool Coordinator of CROPP/Organic Valley for the last 4 years and certified organic farmer. Over the past two years I have participated in many discussions with farmers from various regions of the country about the implementation of the pasture requirement for ruminants. That is the topic I wish to address this morning.

There is no mention in the Organic Foods Production Act of a requirement for pasture for ruminants, no mention even of humane standards. These issues in the Final Rule are part of what "organic" has come to mean, both to the producers of organic food and to the consumers of organic food. They are born of an evolution within the organic community – producers, through their farm practices, and consumers through their comments on the proposed rule and their buying habits – that animals should be raised in conditions that allow them to express their natural behaviors and that maximize their health. I am pleased to be involved in this public process that further defines what we all mean by organic livestock production.

I am here to support the standard recommended by the NOSB Livestock Subcommittee. This recommended standard requires access to pasture during the months when edible forage is available, as a significant portion of the feed requirements during those months. The Farm Plan is proposed as the tool for identifying, implementing and inspecting the use of pasture on a given farm.

We are not in favor of a prescriptive standard that would dictate stocking rates or months per year that livestock must have access to pasture. There is no aspect of organic production that has as much regional variation for production as the management of pasture for livestock, which makes the stocking rate approach difficult to implement and inspect.

Pasture conditions range from year around in some parts of the country, to 6 months of the year when pasture is simply not available because of seasonal temperature, to some parts where there is productive grass for only short periods of time, not because of temperature, but because of rainfall. Conditions range from regions that can support more than one animal per acre to regions that require hundreds of acres to sustain one head over the grazing season. Terrain and topography of the farm layout play a role, as does the rotation plan suited to a particular farm. Therefore, we support the site-specific approach.

The exemptions to the pasture requirement as proposed by the NOSB Livestock Subcommittee are consistent with those for outdoor access:

- a. Conditions under which the health safety, or well-being of the animal could be jeopardized
- b. Inclement weather
- c. Temporary conditions which pose a risk to soil and water quality

The proposed stage of production exemptions to the pasture requirement are less familiar and may be controversial.

We are in support of the exemption for dairy stock under 6 months of age. We recognize that dairy herd replacements are likely to be grouped in several different age categories, with different levels of management required. Unlike beef animals, dairy replacements and steers are, by definition, not with their mothers and require close handling in order to manage milk feeding, competition for feed, and general health. For health concerns, as well as the practicality of managing so many different pastures, an exemption for the first 6 months is an important consideration for dairy operations, reflective of current practice on most organic farms, and not likely to raise concerns with consumers.

Conversely, young beef cattle are typically with their mothers the first several months, and do not warrant an exemption from the pasture requirement. We do, however, advocate an exemption for a finishing period of 120 days. Although pasture finished beef is one kind of organic beef, organic does not say it is the only kind of beef people should eat. Organic consumers express their preferences in the market place, and there is room in that marketplace for ruminants finished with significant amounts of grain in their diets. Those grains are often the splits and screenings from grains raised for human consumption, and can fit in well with the rotation and farm plan. In fulfilling the organic requirement that livestock be allowed to pursue natural behaviors, I would anticipate that organic farm plans will include the feeding of stored forage during grain finishing, and in many cases will include access to pasture, even during grain finishing.

We should note the standard being proposed by the NOSB Livestock Subcommittee, if adopted, will be far from painless. It will eliminate some farmers from organic livestock or dairy production. I have spoken with both dairy and beef producers, currently certified organic farmers in good standing, who are unwilling or feel they are unable to meet this pasture standard. For some, it is a question of economics – the cost of fencing and access to water on their particular farms. For others, it has to do with their particular farm plan and the difficulty of working pasture, rather than the making of stored forage, into a rotation of land that is suited for cropping. For still others, it is based on a sincere belief that the health, nutrition, and comfort of their livestock are better served by maintaining enclosed areas for feeding stored forage, either for longer periods of finishing or for their milking herds. This standard challenges those producers to find a way to modify their farm plans to incorporate access to pasture.

Still, I encourage you to support your Livestock Subcommittee recommendation on access to pasture for ruminants.